

IN THE UNITED STATES DISTRICT COURT
FORT THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
DOUGLAS MEDLEY	:	VIOLATIONS:
	:	21 U.S.C. § 841 (possession with intent to
	:	distribute cocaine base (“crack”) - 1
	:	count)
	:	21 U.S.C. § 841 (possession with intent to
	:	distribute cocaine - 1 count)
	:	18 U.S.C. § 924(c)(1) (possession of a
	:	firearm in furtherance of a drug
	:	trafficking offense - 1 count)
	:	18 U.S.C. § 922(g)(1) (convicted felon in
	:	possession of a firearm - 1 count)
	:	Notice of additional factors
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 11, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

DOUGLAS MEDLEY

knowingly and intentionally possessed with intent to distribute more than 50 grams, that is
approximately 62 grams, of a mixture or substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 11, 2004, at Philadelphia, in the Eastern District
of Pennsylvania, defendant

DOUGLAS MEDLEY

knowingly and intentionally possessed with intent to distribute more than 500 grams, that is
approximately 532 grams, of a mixture or substance containing a detectable amount of cocaine, a
Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 11, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

DOUGLAS MEDLEY

knowingly possessed firearms, that is, one Taurus, Model PT 145 .45 caliber pistol with an obliterated serial number; one Taurus, Model PT 145 .45 caliber pistol, serial number NXA4371; one J.P. Sauer .44 caliber revolver, serial number 0660; one Sig Sauer, Model P220 .45 caliber pistol, serial number G277169; one Smith and Wesson .38 caliber revolver, serial number C33388; and one AA Arms .9mm pistol, serial number 036129, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute cocaine and cocaine base.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 11, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

DOUGLAS MEDLEY,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce firearms, that is, one Taurus, Model PT 145 .45 caliber pistol, serial number NXA4371; one Taurus, Model PT 145 .45 caliber pistol with an obliterated serial number; one J.P. Sauer .44 caliber revolver, serial number 0660; one Sig Sauer, Model P220 .45 caliber pistol, serial number G277169; one Smith and Wesson .38 caliber revolver, serial number C33388; and one AA Arms .9mm pistol, serial number 036129.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offense charged in Count One of this indictment,
defendant **DOUGLAS MEDLEY**:

- a. Committed an offense and relevant conduct involving more than 50 grams of cocaine base, as described in U.S.S.G. § 2D1.1(a)(3).
- b. Committed an offense in which a dangerous weapon (including a firearm) was possessed, as described in U.S.S.G. § 2D1.1(b)(1).

2. In committing the offense charged in Count Two of this indictment,
defendant **DOUGLAS MEDLEY**:

- a. Committed an offense and relevant conduct involving more than 500 grams of cocaine, as described in U.S.S.G. § 2D1.1(a)(3)
- b. Committed an offense in which a dangerous weapon (including a firearm) was possessed, as described in U.S.S.G. § 2D1.1(b)(1).

3. In committing the offenses charged in Counts Three and Four of this indictment, defendant **DOUGLAS MEDLEY**:

- a. Committed an offense in which the firearm had an altered or obliterated serial number, as described in U.S.S.G. § 2K2.1(b)(4).
- b. Committed an offense involving more than three firearms, as described in U.S.S.G. § 2K2.1(b)(1)(A).
- c. Committed any part of the offense subsequent to sustaining one felony conviction of a controlled substance offense, as described in U.S.S.G. § 2K2.1(a)(4)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(g)(1) set forth in Counts Three and Four of this indictment, the defendant

DOUGLAS MEDLEY

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C.

§ 2461(c), the firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- (1) one Taurus, Model PT 145 .45 caliber pistol with an obliterated serial number;
- (2) one Taurus, Model PT 145 .45 caliber pistol bearing serial number NXA4371
- (3) one J.P. Sauer .44 caliber revolver, serial number 0660;
- (4) one Sig Sauer, Model P220 .45 caliber pistol, serial number G277169;
- (5) one Smith and Wesson .38 caliber revolver, serial number C33388; and
- (6) one AA Arms .9mm pistol, serial number 036129.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney